

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Geudy Tatis-Gil

and

Jesus Alberto Perez

Case No.

17-1136-M

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 20, 2017 in the county of Lehigh in the  
Eastern District of Pennsylvania, the defendant(s) violated:

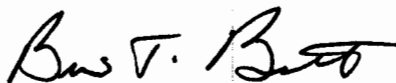
*Code Section**Offense Description*

Title 18 U.S.C. 1708

Theft or receipt of stolen mail matter generally

This criminal complaint is based on these facts:

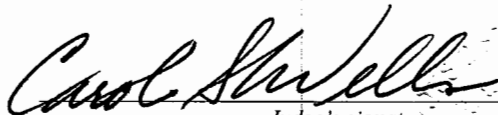
On August 20 2017, in Whitehall, Pennsylvania in the Eastern District of Pennsylvania, defendants Geudy Tatis-Gil and Jesus Alberto Perez knowingly stole and attempted to steal mail from a mail receptacle, that is the U.S. Postal Service blue collection box located at 1136 W. Highland St., Whitehall, PA, in violation of Title 18, U.S.C., Section 1708.

☒ Continued on the attached sheet.*Complainant's signature*

Brian Bennett, U.S. Postal Inspector

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 08/21/2017City and state: Philadelphia, PA*Judge's signature*

Honor Carol S. Wells Moore, Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Brian Bennett, being duly sworn according to law state the following:

**INTRODUCTION**

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since October 2016. I am currently assigned to the Mail Theft Team of the Philadelphia Division of the USPIS. I have conducted and assisted in the criminal investigation involving violation of Title 18, United States Code, 1708.
2. Based on my training and experience I am familiar with mail theft in many forms including "fishing." Fishing is a method of mail theft where individuals drop glue covered objects into blue collection boxes in hopes that mail envelopes in the box awaiting pick up will stick to them. Once the mail is retrieved with the device, the envelopes are opened and personal identifying information and/or checks are stolen.
3. This affidavit is based upon my personal knowledge, experience and training, and other information developed during the course of this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact know to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that violations of Title 18, United States Code, Section 1708 (Theft or Receipts of Stolen Mail Matter) have been committed.
4. I have been intimately involved in this investigation. Based on the information outlined in this affidavit, as well as my training and experience, it is your affiant's belief

that a violation of Title 18, United States Code, Section 1708 has been committed and that Jesus Alberto Perez and Geudy Tatis-Gil committed the violation.

**Summary of Facts Establishing Probable Cause**

5. On June 15, 2017, Postal Inspectors were notified that numerous pieces of mail had been torn or ripped open and found discarded on the side of the road in Bethlehem, Pennsylvania. The discarded mail included empty envelopes, envelopes with payment stubs but no monetary instruments, greeting cards and miscellaneous mailings.
6. On June 16, 2017 I sorted through rifled mail and contacted the individuals whose names appeared on the mailings. The mailers informed me that that they had deposited the items into blue postal collection boxes in the Bethlehem, Pennsylvania area.
7. On July 5, 2017, Postal employees found glue board traps, typically used as traps for insects and mice in three boxes at multiple blue collection boxes in Bethlehem, PA.
8. I am aware that glue board traps, and other similar sticky objects are used as devices in “fishing” that is to steal mail from U.S. mail blue collections boxes.
9. On July 17, 2017, numerous fishing devices were found at collection boxes in Whitehall, Pennsylvania.
10. In August 2017, Postal Inspectors set up devices to monitor a blue collection mailbox in Whitehall, PA.
11. On August 15, 2017, at approximately 2:17am, a car registered to defendant Geudy Tatis-Gil and another person was identified near the blue collection box at 1136 W. Highland St., Whitehall, PA. Shortly afterward, three people approached the box but what they were doing could not be seen.

12. On August 20, 2017, Postal Inspectors set up surveillance on the blue collection box located at 1136 W. Highland St. I first checked the box and confirmed that no fishing devices were present inside. I placed 50 mailings created by Postal Inspectors in the blue collection box.

13. At approximately 1:31am on August 20, 2017, the same car, this time with two occupants pulled up to the blue collection box. The driver left the car and could be seen fishing at the blue collection box. At approximately 1:33am, the male passenger got out of the car and also fished for mail from the blue collection box. The two people then got back in the car and left the blue collection box and continued down W. Highland St.

14. I along with other Inspectors followed the car. I along with other Inspectors stopped the car and detained the two occupants. I saw fishing devices in plain sight on the front seats where the occupants had been sitting. I and other Inspectors also saw a number of the mailings that I had earlier placed in the blue collection box in the front seat and the floor of the car. The mail had been ripped open.

15. The two individuals in the car were identified as Geudy Tatis-Gil and Jesus Alberto Perez. Tatis-Gil drove the car and Perez was in the front passenger seat. Tatis-Gil and Perez were transported to the Whitehall Police Department in Whitehall, Pennsylvania and were interviewed by Postal Inspector Thomas Ninan and me. I read the USPS Warning and Waiver of Rights Form to Geudy Tatis-Gil, who spoke English. Tatis-Gil acknowledged he understood his rights, initialed each right, and signed both sections of the form. Tatis-Gil stated he used fishing devices consisting of envelopes with tape on them so the mail would stick and attached a fishing line to pull the mail out of the box. Tatis-Gil told me he was stealing the mail in hopes there were checks inside.

Tatis-Gil told me he has done this three times before and had successfully sold three checks stolen from the mail for \$50.00 apiece.

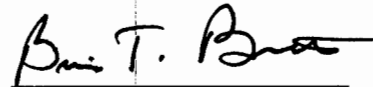
16. Tatis-Gil signed USPS Consent to Search Forms authorizing investigators to search his vehicle. I searched Tatis-Gil's vehicle and found fishing devices, the mail I had placed in the blue collection box, which had been opened, along with checks, and supplies to make more fishing devices.

17. Jesus Alberto Perez stated he did not understand English and I contacted Voiance Language Services to translate the interview. Jesus Alberto Perez was provided the USPS Warning and Waiver of Rights form written in Spanish and he signed the form. The translator asked if Perez understood and he stated he did. Perez admitted to using fishing devices to steal mail out of blue collection boxes.

18. I showed Jesus Alberto Perez a video screen shot of one of the fishing suspects at the 1136 W. Highland St. blue collection box on the morning of the arrest. Perez identified himself as the individual fishing for mail on the screen. Perez stated he went with his friend Tatis-Gil to steal mail from blue collection boxes. Perez stated he and Tatis-Gil dropped objects with sticky substances attached to a fishing line into the blue collection box to get mail to stick to it. Perez told me he would then pull the mail out of the box.

**Conclusion**

19. Based on, but not limited to, the above facts, your affiant believes that there is probable cause to believe that Geudy Tatis-Gil and Jesus Alberto Perez violated Title 18, United States Code, Section 1708 (Theft or Receipt of Stolen Mail Matter).



BRIAN BENNETT  
US POSTAL INSPECTOR

Sworn and Subscribed to before me  
On this 2/31 day of August, 2017



HONORABLE CAROL S. MOORE WELLS  
*United States Magistrate Judge*